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Attorneys for Secured Creditor GMAC MORTGAGE, LLC

10
11 **UNITED STATES BANKRUPTCY COURT**
12 **DISTRICT OF NEVADA**

13 In re

14 ARGEMINO S DOMINGUEZ,

15 Debtor(s).

Bankruptcy Case No. BK-S-10-29572-lbr

Chapter 13

**GMAC MORTGAGE, LLC'S REQUEST
FOR SPECIAL NOTICE AND SERVICE
OF PAPERS AND RESERVATION OF
RIGHTS**

17 TO: UNITED STATES BANKRUPTCY JUDGE, THE DEBTOR(S), AND ALL INTERESTED
18 PARTIES

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20 PLEASE TAKE NOTICE that the firm of PITE DUNCAN, LLP, attorneys for GMAC
21 Mortgage, LLC, hereby requests special notice of all events relevant to the above-referenced
22 bankruptcy and copies of all pleadings or documents filed in relation to the above-referenced
23 bankruptcy, including all pleadings or notices under Federal Rules of Bankruptcy Procedure, Rule
24 2002, the commencement of any adversary proceedings, the filing of any requests for hearing,
25 objections, and/or notices of motion, or any other auxiliary filings, as well as notice of all matters
26 which must be noticed to creditors, creditors committees and parties-in-interest and other notices as
27 required by the United States Bankruptcy Code and Rules and/or Local Rules of the above-
28 referenced bankruptcy court.

1 PITE DUNCAN, LLP, requests that for all notice purposes and for inclusion in the Master
2 Mailing List in this case, the following address be used:

3 ACE VAN PATTEN, ESQ.
4 PITE DUNCAN, LLP
4375 Jutland Drive, Suite 200
5 P.O. Box 17933
San Diego, CA 92177-0933

6 Neither this Request for Special Notice nor any subsequent appearance, pleading, claim,
7 proof of claim, documents, suit, motion nor any other writing or conduct, shall constitute a waiver of
8 the within party's:

9 a. Right to have any and all final orders in any and all non-core matters entered only
10 after de novo review by a United States District Court Judge;

11 b. Right to receive service pursuant to Fed. R. Civ. P. 4 made applicable to the instant
12 proceeding by Fed. R. Bankr. P. 7004, notwithstanding Pite Duncan, LLP's participation in the
13 instant proceeding. This Request for Special Notice shall not operate as a confession and/or
14 concession of jurisdiction. Moreover, the within party does not authorize Pite Duncan, LLP, either
15 expressly or impliedly through Pite Duncan, LLP's participation in the instant proceeding, to act as
16 its agent for purposes of service under Fed. R. Bankr. P. 7004;

17 c. Right to trial by jury in any proceeding as to any and all matters so triable herein,
18 whether or not the same be designated legal or private rights, or in any case, controversy or
19 proceeding related hereto, notwithstanding the designation or not of such matters as "core
20 proceedings" pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial right is pursuant to
21 statute or the United States Constitution;

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1 d. Right to have the reference of this matter withdrawn by the United States District
2 Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and

3 e. Other rights, claims, actions, defenses, setoffs, recoupments or other matters to which
4 this party is entitled under any agreements at law or in equity or under the United States
5 Constitution.

6 Dated: February 1, 2011

PITE DUNCAN, LLP

7 /s/ Ace Van Patten
8 4375 Jutland Drive, Suite 200
9 P.O. Box 17933
10 San Diego, CA 92177-0933
11 (858) 750-7600
12 NV Bar #11731
13 Attorney for GMAC
14 MORTGAGE, LLC
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing REQUEST FOR SPECIAL NOTICE AND SERVICE OF PAPERS AND RESERVATION OF RIGHTS was served on February 1, 2011.

Service was accomplished by the method and to the following as indicated:

BY ELECTRONIC NOTICE OR FIRST CLASS MAIL

Argemino S Dominguez
2848 Via Stella Street
Henderson, NV 89014

David M. Crosby
Crosby & Associates
711 S. 8th St
Las Vegas, NV 89101

Rick A. Yarnall
701 Bridger Ave, #820
Las Vegas, NV 89101

U.S. Trustee
Department of Justice
300 Las Vegas Boulevard, So.
Suite 4300
Las Vegas, NV 89101

Maria T. Shattuck
2848 Via Stella Street
Henderson, NV 89074

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on February 1, 2011, at San Diego, California.

/s/ Sohala Sayah-Sina